

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

**RENE CASTILLO, Individually and on
Behalf of All Others Similarly Situated**

PLAINTIFF

vs.

No. 5:20-cv-1269-FB-ESC

ISEC INCORPORATED

DEFENDANT

**PLAINTIFF'S MOTION FOR EXTENSION OF DEADLINE
TO FILE MOTION FOR SETTLEMENT APPROVAL**

Plaintiff Rene Castillo, individually and on behalf of all others similarly situated, by and through his undersigned counsel, for their Motion for Extension of Time to File Motion for Settlement Approval, states as follows:

1. On March 30, 2023, the Parties filed a Joint Advisory and Notice of Settlement informing the Court that they were in the process of finalizing a settlement agreement. ECF No. 41.
2. The Parties filed their first Joint Motion for Extension of Time to File Motion for Settlement Approval, requesting that the deadline to file their motion for settlement approval be extended by twenty-two days, to May 22, 2023.
3. Plaintiff represents that the Parties have drafted and finalized a settlement agreement document and are in the process of fully executing it. In addition, the Parties have drafted a Motion for Approval.

4. Plaintiff avers that Defendant is currently in the process of executing the agreement and reviewing the draft Motion for Approval.

5. Accordingly, Plaintiff requests that the deadline to file the motion for settlement approval be extended by 7 days, to May 29, 2023.

6. This extension is sought in good faith and not for the purpose of delay.

7. Plaintiff's counsel attempted to reach counsel for Defendant the day of this Motion to file this Motion jointly. However, no response was received. Accordingly, Defendant is not a party to this Motion.

WHEREFORE, premises considered, Plaintiff prays this Court grant this Motion to extend the deadline to file their motion for settlement approval to May 29, 2023.

Respectfully submitted,

**RENE CASTILLO, Individually
And on Behalf of All Others
Similarly Situated, PLAINTIFF**

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/s/ Josh Sanford

Josh Sanford

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CERTIFICATE OF SERVICE

I hereby certify that on May 22, 2023, a true and correct copy of the foregoing SECOND JOINT MOTION FOR EXTENSION was filed with the Clerk of Court via the CM/ECF system which served a copy to the following:

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/s/ Josh Sanford
Josh Sanford